

# **EXHIBIT B**

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**From:** Rakestraw, Michelle  
**Sent:** Friday, October 13, 2023 10:00 AM  
**To:** Noam Besdin  
**Cc:** Griffin Sloan; Alexander Loftus; Ross Good; Wasserman, Matthew; Mintzer, Rebekah  
**Subject:** RE: Daniels SharpSMART v Cyntox 1:23-cv-03536-- Initial Disclosures

Noam,

This email is being sent pursuant to LR 37.2.

We will be filing a motion to dismiss the New Jersey matter and consolidate it with the Illinois matter given that there is significant overlap between the two cases. Much of the discovery will be duplicative and the depositions will likely be of the same individuals. Please advise if you are amenable to staying your deposition notices until we are able to obtain a ruling on the New Jersey matter or if we will need to file a Motion for Protective Order.

Thank you,



**Michelle A. Rakestraw**

Associate

Dinsmore & Shohl LLP • Legal Counsel

222 West Adams Street, Suite 3400, Chicago, IL 60606

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**From:** Noam Besdin <nbesdin@steinadlerlaw.com>  
**Sent:** Friday, September 1, 2023 1:45 PM  
**To:** Wasserman, Matthew <matthew.wasserman@dinsmore.com>; Rakestraw, Michelle <Michelle.Rakestraw@DINSMORE.COM>  
**Cc:** Griffin Sloan <gsloan@steinadlerlaw.com>; Alexander Loftus <alex@loftusandeisenberg.com>; Ross Good <ross@loftusandeisenberg.com>  
**Subject:** RE: Daniels SharpSMART v Cyntox 1:23-cv-03536-- Initial Disclosures

Please see the attached Requests for Production of Documents and Notices of Deposition.

Best,

**NOAM BESDIN**

**STEIN | ADLER | DABAH | ZELKOWITZ LLP**

[nbesdin@steinadlerlaw.com](mailto:nbesdin@steinadlerlaw.com)

Direct: 929.946.8530 | Cell: 917.334.0410

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**From:** Noam Besdin  
**Sent:** Friday, August 25, 2023 3:22 PM  
**To:** Wasserman, Matthew <[matthew.wasserman@dinsmore.com](mailto:matthew.wasserman@dinsmore.com)>; Rakestraw, Michelle <[Michelle.Rakestraw@DINSMORE.COM](mailto:Michelle.Rakestraw@DINSMORE.COM)>  
**Cc:** Griffin Sloan <[gsloan@steinadlerlaw.com](mailto:gsloan@steinadlerlaw.com)>; Alexander Loftus <[alex@loftusandeisenberg.com](mailto:alex@loftusandeisenberg.com)>; Ross Good

<[ross@loftusandeisenberg.com](mailto:ross@loftusandeisenberg.com)>

**Subject:** Daniels Sharpsmart v Cyntox 1:23-cv-03536-- Initial Disclosures

Counsel:

Please see the attached.

Best,



**NOAM BESDIN, ESQ.**

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